

EXHIBIT A.2

Notice Plan

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**VISHVA DESAI and PHILIP J. CHARVAT, on
behalf of themselves and others similarly situated,**

Plaintiffs,

v.

Case No. 1:11-cv-1925

ADT SECURITY SERVICES, INC.,

Defendant.

NOTICE PLAN

The Plaintiffs have retained AB Data, Ltd. (“AB Data”) to serve as the administrator of the proposed class action settlement.¹ The Settlement Class members are consumers who received unsolicited pre-recorded calls to their residential or cellular phone promoting ADT Security Services, Inc. (now known as The ADT Corporation or ADT, LLC (collectively “ADT” or “ADT Security Services, Inc.”)) between January 1, 2007 and the date of the Settlement Agreement. Because the calls were placed by third parties and the identity of many of those third-party callers is unknown, the Plaintiffs are unable to identify *all* class members. For purposes of notice, the potential settlement class is comprised of two types of consumers. The first type consists of 1,407,712 class members who were called by EMI using Dynamic Interactive Corp.’s voice broadcasting platform with a pre-recorded message for whom Plaintiffs have unique telephone numbers along with associated mailing addresses and have confirmed were actual recipients of calls mentioning ADT (“Direct Notice Consumers”). The second type is consumers called with a pre-recorded message promoting ADT for whom Plaintiffs do not have mailing addresses and who may have been called by EMI without mentioning ADT or for

¹ All capitalized terms in this Notice Plan shall have the same meaning as ascribed to them in the Settlement Agreement, unless otherwise noted.

which Plaintiffs otherwise do not have data or who may have been called by some other third party or entity ("Publication Notice Consumers"). Because the identities of these individuals is unknown, Plaintiffs have no way of identifying these individuals to the degree necessary to provide them with direct mail notice.

The Plaintiffs will give notice of the settlement to Settlement Class Members who are Direct Notice Consumers through a direct notice that will be mailed, along with a claim form, to each of the 1,407,712 individuals for whom an address can be located. Plaintiffs estimate that they will be able to locate an address for approximately 50%-70% of these consumers and they will receive direct notice. The remainder of the consumers for whom Plaintiffs cannot locate an address will be Publication Notice Consumers and will receive notice by publication.

Through AB Data, the Plaintiffs intend to give individual notice of the settlement by mail to Direct Notice Consumers. These individuals will be identified by Plaintiffs' counsel and AB Data from the telephone logs produced by Dynamic Interactive Corp., which contain a list of 1,407,712 unique telephone numbers ("Source List"). The mailing will contain the notice and a claim form.

As discussed in Plaintiffs' Unopposed Motion for Preliminary Approval of the Settlement Agreement, A.B. Data will perform an address look-up called a "Reverse Append" look-up for the unique telephone numbers in the Source List. Reverse Append matches telephone numbers to a proprietary consumer database, which contains more than 150 million individuals in the United States, including more than 89 million households, which is over 90% of all U.S. households. Where a match exists, A.B. Data will obtain the name and address for the settlement class member identified ("Original Mailing List"). Once the Original Mailing List is compiled, A.B. Data will run the list through the U.S. Post Office's National Change of Address ("NCOA")

database to ensure that the most current addresses for potential settlement class members are utilized for the mailing ("Mailing List"). Following the mailing, A.B. Data will tabulate and report the number of Notices that are returned "undeliverable-as-addressed" ("UAA"). For those Notices returned UAA that provide a forwarding address, A.B. Data will re-mail the Notice to the forwarding address. The number of completed, returned, and re-mailed notices will be reported in A.B. Data's mailing affidavit.

As for Publication Notice Consumers, the Plaintiffs will give notice of the settlement to those individuals through a media publication plan. It is assumed that because the Settlement Class Members are disbursed throughout the entire U.S. adult population, coverage as a percentage of the Settlement Class would be approximately the same as coverage as a percentage of U.S. households. The summary notice ("Media Notice") contained in each of the publications included in the media publication plan will include a short, plain description of the background of the Action, advise Settlement Class Members of their rights to stay in the class, participate, object, or opt-out, and provide a toll-free number and website established by A.B. Data to allow persons to obtain additional information about the Action and a claim form. The Media Notice is proposed to be included in each of the following national publications:

PUBLICATION	CIRCULATION	NOTICE SIZE	INSERTS
<i>PARADE</i>	33,000,000	2/5 page	2
<i>USA WEEKEND</i>	22,250,000	2/5 page	1
<i>READER'S DIGEST</i>	5,577,717	Full page	1
<i>GOOD HOUSEKEEPING</i>	4,346,757	1/3 page	1
<i>PEOPLE</i>	3,563,035	1/3 page	1
<i>TV GUIDE</i>	3,276,822	1/3 page	1
<i>SPORTS ILLUSTRATED</i>	3,204,945	1/3 page	1
<i>TIME</i>	2,010,879	1/3 page	1
<i>USA TODAY (FRIDAY)</i>	1,981,016	1/6 page	1
TOTAL	79,211,171		

The Media Notice outlined above will reach an estimated 79,211,171 households nationwide. The total number of persons exposed to the notice program, or “gross impressions,” will be 158,422,342, or 67% of all adults in the United States. The proposed media publication plan will establish a settlement website with downloadable case documents and claim forms. In addition, the terms of the notice will be disseminated via Internet banners on popular websites detailed in the table below, a method expected to generate 2.2 million views (or “impressions”) of the banners over a 45-day period. Publication Notice Consumers can click on the banner, which will link to the settlement website.

WEBSITE	POSITIONING	IMPRESSIONS
Yahoo!	Inside Pages on Yahoo!/Run of Network	900,000
Microsoft/MSN	Inside Pages on MSN/Run of Network	900,000
NYTimes.com	Inside Pages/Run of Site	400,000
	TOTAL	2,200,000

The website also will include a statement of the parties, a list of anticipated frequently asked questions with responses, and other pertinent information.